

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendant.

Civil Action No: 1:19-cv-11441-LTS

PLAINTIFF'S PROPOSED QUESTIONS FOR *VOIR DIRE* EXAMINATION

Plaintiff Lisa Menninger respectfully submits the following proposed questions to be asked of potential jurors in *voir dire* examination:

1. Have you or any of your close family members ever owned or worked for a company that does business with PPD, PPD, Inc., or Thermo Fisher?
2. Have you, your close family members, or your company, ever had any relationship with any employee of PPD, PPD, Inc., or Thermo Fisher?
3. Are any of you or your close family members employed in the fields of psychology, psychiatry, social work or other licensed therapy providers, pathology, or pharmaceuticals?
4. Have any of you ever worked in a laboratory for your primary job?
5. Have you or any close family members ever been fired from a job for reasons that you believe were unfair or discriminatory?
6. Have you or any close friend or close family member ever been accused of discriminating or retaliating against someone in the workplace?
7. Have you ever been involved in any kind of investigation at work (either as management, a witness, or an employee)?
8. Have you or your close family members ever requested an accommodation for disability at your workplace or from a landlord?
9. Have any of you ever worked in a supervisory position where you received or considered an employee's request for accommodation of their disability?

10. Are any of you suspicious of people who file lawsuits?
11. Do any of you have any negative feelings or bias with respect to people that suffer from depression or other mental illnesses?
12. Do any of you believe that people with depression simply need to try harder to overcome their symptoms?
13. Would anyone have a problem awarding significant compensatory damages to the Plaintiff even if the Plaintiff proved to you that that was the amount of her loss?
14. Do any of you feel that the law should not allow injured people to recover damages for intangible things like mental anguish and emotional distress?
15. Do any of you feel that too much money is awarded for claims of emotional distress?
16. Would any of you have a problem with awarding someone substantial damages for emotional suffering?
17. Would any of you have difficulty awarding punitive damages?

Respectfully submitted,
Plaintiff Lisa Menninger,
By her attorneys,

/s/ Hampton M. Watson
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Date: March 10, 2023

CERTIFICATE OF SERVICE

I, Hampton M. Watson, certify that on March 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant by electronically serving its counsel of record.

/s/ *Hampton M. Watson*
Hampton M. Watson